

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 9/2/20
2. Deadline for first request for production of documents and first request for interrogatories: 9/2/20
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) \_\_\_\_\_; defendant(s) \_\_\_\_\_
3. Date for completion of any joinder of additional parties and amendment of the pleadings: N/A
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) 0; defendant(s) 0
4. Number of depositions by plaintiff(s) of: parties 3; non-parties 0
5. Number of depositions by defendant(s) of: parties 1; non-parties 1
6. Date of status conference (joint status report due two business days in advance): \_\_\_\_\_
7. Date for completion of factual discovery: 1/4/2021
8. Are expert witnesses needed? Yes X No \_\_\_\_\_
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical 2; non-medical 1
- 8(b). Date for completion of those expert reports: 3/4/2021
- 8(c). Number of expert witnesses, if any, of defendant(s): medical 3; non-medical 1
- 8(d). Date for completion of those expert reports: 5/4/2021
9. Date for completion of expert discovery: 7/2/2021
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): \_\_\_\_\_
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: Rule 56 on Liability  
9/2/21

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions:

Rule 56 on Liability  
9/2/21

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.)

Yes \_\_\_ No X

14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.)

Yes \_\_\_ No X

15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.)

Yes \_\_\_ No X